P-2007.0034

DEAFS/SF

INTERSTATE
CONCRETE & ASPHALT

ORIGINAL

March 13, 2007

RECEIVED
MAR 14 2007
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A.Q. PROGRAM

Mike Simon
Idaho Dept. of Environmental Quality
Air Quality Division
1410 N. Hilton
Boise, ID 83706

Subject: Facility ID No. 777-00403 Dover Concrete Batch Plant
Denial Letter Response

Dear Mr. Simon

This is in response to your denial letter dated March 6, 2007 regarding the above facility. Please find enclosed two (2) copies of our 15-Day Pre-Permit Construction Approval Application for Dover, ID along with two (2) Air Modeling CD's. It is our request that we be allowed to start construction prior to obtaining the PTC for this site.

Item #2 of your letter requests a copy of the public meeting notice which is enclosed along with an affidavit of publication.

I have been advised by Mark Peterson with Aspen that items 3 & 4 have been addressed by conversations with DEQ staff.

Please contact me if there are any questions at 208.666.6116

Sincerely,

Corky Witherwax
Aggregate Sales/Credit
Environmental Manager

AFFIDAVIT OF PUBLICATION

STATE OF IDAHO)
) ss.
County of Bonner)

Sherilyn Jones, being first duly sworn on oath, deposes and states:

1. I am a citizen of the United States of America, over the age of 18 years, a resident of Bonner County, Idaho, and am not a party to the proceedings referred to in the attached Public Meeting
My business address is P.O. Box 159, Sandpoint, Idaho.

2. I am the Bookkeeper of the Bonner County Daily Bee, a newspaper of general publication in Bonner County, Idaho;

3. Said newspaper has been continuously and uninterruptedly published in Bonner County, Idaho during a period of 12 months prior to the first publication of said Notice, and thereafter.

4. The attached Notice was published in the regular and entire issue of the Bonner County Daily Bee for a period of 1 ~~consecutive weeks~~, commencing on the 7 day of Mar, 2007, and ending on the 7 day of Mar, 2007.

Sherilyn Jones

SUBSCRIBED AND SWORN to before me, the undersigned Notary Public, this 8 day of March, 2007.

Carolyn L. Inge
Notary Public
Residing at: Sandpoint
Comm. Exp.: 8/12

CAROLYN L. INGE
NOTARY
PUBLIC
STATE OF IDAHO

8493

DE/AFS/SF

RECEIVED

MAR 14 2007

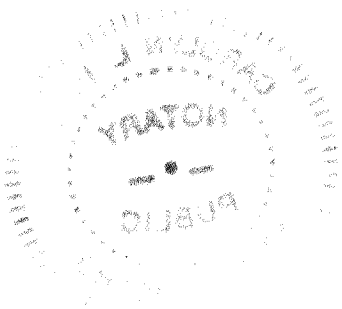
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A.Q. PROGRAM

LEGAL NOTICE
PUBLIC MEETING
ANNOUNCEMENT

Interstate Concrete & Asphalt Co. Pre-Permit Construction

An informational meeting will be held at the Quality Inn Meeting Room at 807 N. 5th Ave. Sandpoint, ID from 9:00 AM to 10:00 AM on March 19, 2007 in accordance with the Rules for the Control of Air Pollution in Idaho. Idaho Administrative Code IDAPA 58.01.01.213.02 - Permit to Construct Procedures for Pre-Permit Construction. The purpose of the meeting is to fulfill the air quality pre-permit construction requirement per IDAPA – 58.01.01.213.02 and inform the general public of Interstate Concrete & Asphalts intention to locate a concrete batch plant at 23813 Hwy 2, Dover, Id.

Legal SNP# 8493
March 7, 2007



Interstate Concrete and Asphalt Company
Concrete Batch Plant

Air Quality
15-Day Pre-Permit Construction Approval Application
Dover Batch Plant

Aspen File: ICA07002

Prepared for:

Interstate Concrete and Asphalt Company
845 West Kathleen Avenue
Coeur d'Alene, Idaho 83814

Prepared by:

Aspen Consulting & Engineering, Inc.
P.O. Box 4822
Helena, MT 59604

March 8, 2007

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APPENDICES

1.0 PROCESS DESCRIPTION

Interstate Concrete and Asphalt Company (ICA) is proposing to permit a portable concrete batch plant to be originally located in Bonner County, Idaho and will be known as the Dover Plant.

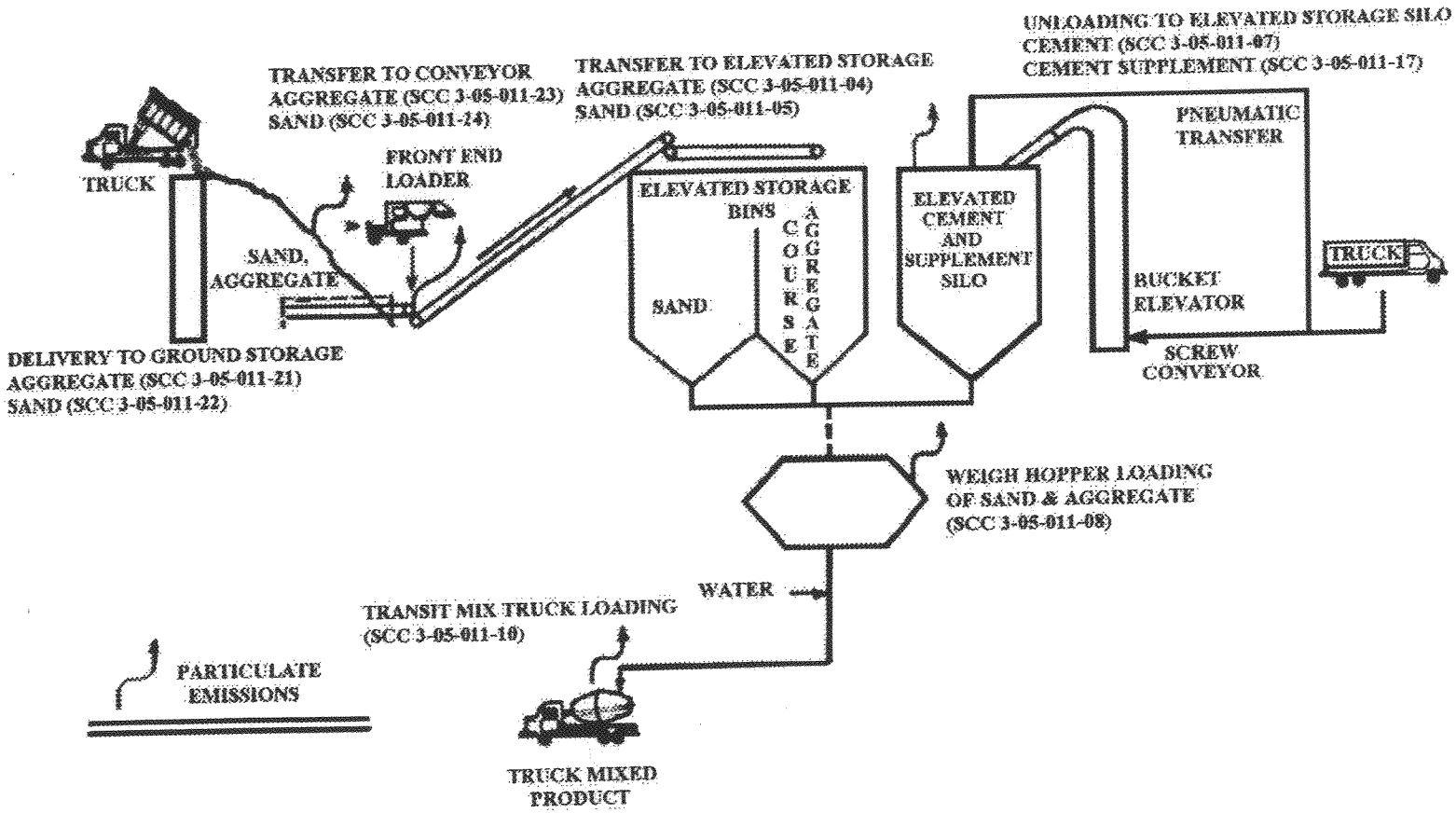
ICA proposes to permit a dry batch concrete plant. The plant will have a maximum capacity of 150 cubic yards of concrete per hour. ICA proposes a daily limit of 1,800 yd^3/hr of concrete and an annual limit of 250,000 yd^3/yr of concrete.

Raw materials will arrive at the site by truck. Raw materials will then be dumped onto storage piles or conveyed into storage silos. Sand and course aggregate will be stored on the ground in storage piles. Cement and fly ash will be stored on-site in silos. These raw materials will be combined in a weigh hopper to form the final concrete product.

Upon demand for concrete, the raw materials will be weighed and dumped into a cement truck in the appropriate proportions. Water will then be added and mixed with the sand, aggregate, cement, and fly ash for off-site delivery of the final product. Figure 1 provides a general process flow diagram.

Idaho Department of Environmental Quality (DEQ) Standard Permit to Construct application forms are provided in Appendix A.

2.0 PROCESS FLOW DIAGRAM



3.0 APPLICABLE REQUIREMENTS

This section outlines the applicable requirements to the facility and applicability to specific emitting units when appropriate. Demonstration of compliance is mandated by IDAPA 58.01.01.213.c

3.1 FEDERAL RULES

No relevant federal rules not already addressed by IDAPA rules are applicable.

3.2 IDAHO ADMINISTRATIVE PROCEDURES ACT – DEPARTMENT OF ENVIRONMENTAL QUALITY – AIR POLLUTION CONTROL - 58.01.01

3.2.1 SECTION 123 - CERTIFICATION OF DOCUMENTS

This rule requires that all reports, applications, data, etc. submitted to the Department shall contain a certification by the responsible official that, based on information and belief formed after reasonable inquiry, the statements and information are true, accurate, and complete.

ICA has included a certification by the responsible official on the application forms included with this submittal in Appendix A.

3.2.2 SECTION 128 - CONFIDENTIAL INFORMATION

This rule requires that all information submitted becomes public information unless it is submitted under a trade secret claim.

ICA is not submitting any confidential information.

3.2.3 SECTION 156 -TOTAL COMPLIANCE

When more than one section of the Idaho air quality rules applies, all sections must be met for total compliance unless otherwise specified in the rules.

ICA will comply with all applicable rules.

3.2.4 SECTION 210 - DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS

Section 210 et. seq. provides the procedures for which a facility seeking a permit to construct shall use to demonstrate compliance with air toxic standards. An analysis has been conducted using these standards and is included in Section 7.0.

Affected Units:

1. Cement Silo
2. Flyash Silo
3. Truck Mix Loading

3.2.5 SECTION 223 - EXEMPTION CRITERIA, RECORDKEEPING, AND REPORTING FOR TOXIC AIR POLLUTANT EMISSIONS

No permit to construct for toxic air pollutants is required if the facility meets the exemption criteria listed in this rule. Exemption status also requires reporting requirements.

ICA is not applying for an exemption under this rule. Instead, ICA is complying with Section 210 provisions for air toxics in the permit application process (See Section 7.0).

3.2.6 SECTION 226 - PAYMENT OF FEES FOR PERMITS TO CONSTRUCT

Section (1) of this rule provides the address to send payment for the permit to construct application fee.

Section (2) states that no permit to construct application will be processed and no permit issued by the department until the permit processing fee has been paid.

ICA has submitted the appropriate processing fee.

3.2.7 SECTION 577 -AMBIENT AIR QUALITY STANDARDS FOR SPECIFIC AIR POLLUTANTS

This rule specifies the ambient air quality standards for PM_{10}, Sulfur Oxides, Ozone, Nitrogen Dioxide, Carbon Monoxide, Flourides, and Lead.

ICA will comply with these standards. Only PM_{10} is proposed to increase by this project and therefore no further demonstration was necessary for the remaining pollutants. The appropriate modeling results are included in Section 7.0.

3.2.8 SECTION 578 - DESIGNATION OF ATTAINMENT, UNCLASSIFIABLE, AND NONATTAINMENT AREAS

This rule establishes the procedures for designating air quality status for pollutants and the associated boundaries. The rule requires no direct action by the applicant; however, this rule is the basis for the establishment of the nonattainment status for pollutants, which determines the types of information required by the Department. ICA will supply all relevant data if ever required.

3.2.9 SECTION 585 -TOXIC AIR POLLUTANTS NON-CARCINOGENIC INCREMENTS

This rule establishes the screening emission levels (ELs), and the acceptable ambient concentrations (AACs) for non-carcinogens. AACs are based on a 24-hour average concentration. ICA has conducted an analysis showing compliance with this rule and is included in Section 7.0.

3.2.10 SECTION 586 - TOXIC AIR POLLUTANTS CARCINOGENIC INCREMENTS

This rule establishes the screening emission levels (ELs), and the acceptable ambient concentrations (AACs) for carcinogens. AACCs are based on an annual average concentration. ICA has conducted an analysis showing compliance with this rule and is included in Section 7.0.

3.2.11 SECTION 590 - NEW SOURCE PERFORMANCE STANDARDS

This rule mandates that sources comply with the New Source Performance Standards listed in 40 CFR Part 60. No NSPS regulation has been promulgated for Batch Cement Plants.

3.2.12 SECTION 591 -NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

The owner or operator of any stationary source must comply with 40 CFR 61 and 40 CFR 63 as applicable to the stationary source. ICA is not a major source of hazardous air pollutants and therefore these rules do not apply.

3.2.13 SECTION 625 -VISIBLE EMISSIONS

According to this rule, a person shall not discharge any pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by this section. Exempted sources are allowed forty percent (40%) opacity. Opacity is determined by EPA method 9.

ICA has no exempted sources and will comply with the 20 percent opacity rule.

3.2.14 SECTION 650 - RULES FOR THE CONTROL OF FUGITIVE EMISSIONS

The purpose of this rule is to require that all reasonable precautions are taken to prevent fugitive dust. Section 651 details control measures.

Applicable sources include: Paved and unpaved roadways.

3.2.15 SECTION 651 - GENERAL RULES

This section outlines procedures for controlling fugitive dust including the use of water sprays, chemical dust suppressants, covering of trucks, road paving, and removal of materials.

ICA will utilize water sprays on storage piles, and on traveled roadways within the plant boundary if or when a fugitive dust problem is observed.

3.2.16 SECTION 675 - FUEL BURNING EQUIPMENT – PARTICULATE MATTER

This section merely states that the purpose of sections 676-681 is to establish particulate matter emission standard for fuel burning equipment. ICA does not have any fuel burning sources and this section is not applicable.

3.2.17 SECTION 676 - STANDARDS FOR NEW SOURCES

A person shall not discharge into the atmosphere from any fuel burning equipment with a rated input capacity of 10 Million Btu's per hour or more, and commencing operation on or after October 1, 1979 particulate matter in excess of the amounts shown in the rule.

ICA does not have any fuel burning sources proposed for this project and therefore this rule is not applicable.

3.2.18 SECTION 700 -PARTICULATE MATTER – PROCESS WEIGHT LIMITATIONS

This section states that sections 701 through 703 establish particulate matter limits for process equipment. ICA will comply with applicable standards.

3.2.19 SECTION 701 - PARTICULATE MATTER -- NEW EQUIPMENT PROCESS WEIGHT LIMITATIONS

This section sets particulate limits for sources which commence operation on or after October 1, 1979. The particulate limit is set by the equation presented in the section.

Affected Units: Process Fugitives

ICA will comply with the standard.

3.2.20 SECTION 702 - PARTICULATE MATTER -- EXISTING EQUIPMENT PROCESS WEIGHT LIMITATIONS

This section sets particulate limits for sources which were in operation prior to October 1, 1979. The particulate limit is set by the equation presented in the section.

ICA has no equipment which meet this criteria and therefore this section is not applicable.

3.2.21 SECTION 775 - RULES FOR THE CONTROL OF ODORS

The purpose of this section is to control odorous emissions from all sources for which no gaseous control rules apply. ICA's emissions are regulated by other ambient air quality standards and therefore this rule does not apply.

4.0 POTENTIAL TO EMIT

Emissions were calculated for both criteria and toxic pollutants. The following sections describe the methodologies, references, and results.

4.1 CRITERIA POLLUTANTS

Potential emissions from ICA's Dover portable concrete batch plant were determined using the EPA document AP-42. Section 11.12-2 (6/06), emission factors for concrete batching, and Section 13.2.4 for material handling were used to calculate potential particulate matter (PM10) emissions.

PM_{10} fugitive emissions are controlled using water sprays. Aggregate and sand handling are assumed to have a 75% control because the aggregate and sand material are wet as delivered and ICA will utilize watering when fugitives are observed. The truck mix concrete loadout is controlled by a rubber boot fitting and any dust being redirected back to the weigh-hopper where baghouse control exists. A 95% control was assumed for the truck loadout.

Table 4-1 presents a summary of the concrete batch plant emissions inventory. A more detailed emissions inventory spreadsheet is included in Appendix B.

TABLE 4-1
EMISSIONS SUMMARY
CONCRETE BATCH PLANT
INTERSTATE CONCRETE AND ASPHALT CORP.
DOVER PORTABLE

Emissions Source	Controlled PM_{10} Potential Emissions (tons/yr)
Aggregate Dump to Ground	0.095
Sand Dump to Ground	0.022
Aggregate Dump to Conveyor	0.095
Sand Dump to Conveyor	0.022
Aggregate Conveyor to Elevated Storage	0.095
Sand Conveyor to Elevated Storage	0.022
Cement Silo Loading	0.010
Weigh Hopper Loading	0.025
Fly Ash Silo Unloading	0.022
Truck mix loading	0.490
Total:	**0.90**

Notes:
tons/yr Tons per Year
PM_{10} Particulate Matter with an aerodynamic diameter less than 10 microns

4.2 TOXIC AIR POLLUTANTS

Toxic air pollutants (TAPs) were estimated using AP-42, Section 11.12-8 emission factors (June 2006 edition) for Concrete Batch Plants. Only emission factors for toxics listed in IDAPA 58.01.01.585 and 586 were selected from AP-42.

Emission estimates for toxics are calculated to determine if the toxic pollutants resulting from the proposed facility modification will be within acceptable levels as provided for in IDAPA 58.01.01.585 and 586. This rule exempts specific toxics if the change is below the screening emissions level (EL) or if they are below the acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) as prescribed by this rule.

Table 4-2 below presents the emissions summary for toxic air pollutants as a result of the proposed portable batch plant. Compounds listed in bold signify that the pound per hour emission rate is above the EL for that compound. These compounds are shown to be below the AACs or AACCs in Section 7.0 of this document. Emission sources which were listed in AP-42 were included in the toxics inventory and added to determine totals. Only toxics found to be above the ELs were evaluated in the modeling analysis. A more detailed emissions inventory spreadsheet is included in Appendix B.

TABLE 4-2
TOXIC AIR POLLUTANT
EMISSIONS SUMMARY
CONCRETE BATCH PLANT
INTERSTATE CONCRETE AND ASPHALT CORP.
DOVER PORTABLE

Pollutant	Emissions Total lb/hr	Idaho EL (lb/hr)
Arsenic	**2.29E-06**	1.50E-06
Beryllium	1.96E-07	2.80E-05
Cadmium	1.74E-08	3.70E-06
Chromium	6.06E-06	3.30E-02
Chromium (VI)	**1.34E-06**	5.60E-07
Manganese	2.57E-05	3.33E-01
Nickel	7.46E-06	2.70E-05
Phosphorus	1.91E-05	7.00E-03
Selenium	1.13E-06	1.30E-02

Notes:
Compounds in bold signify that the compound exceeds the allowable EL.
lb/hr Pounds per Hour
EL Emissions Level

5.0 DETERMINE FACILITY'S CLASSIFICATION

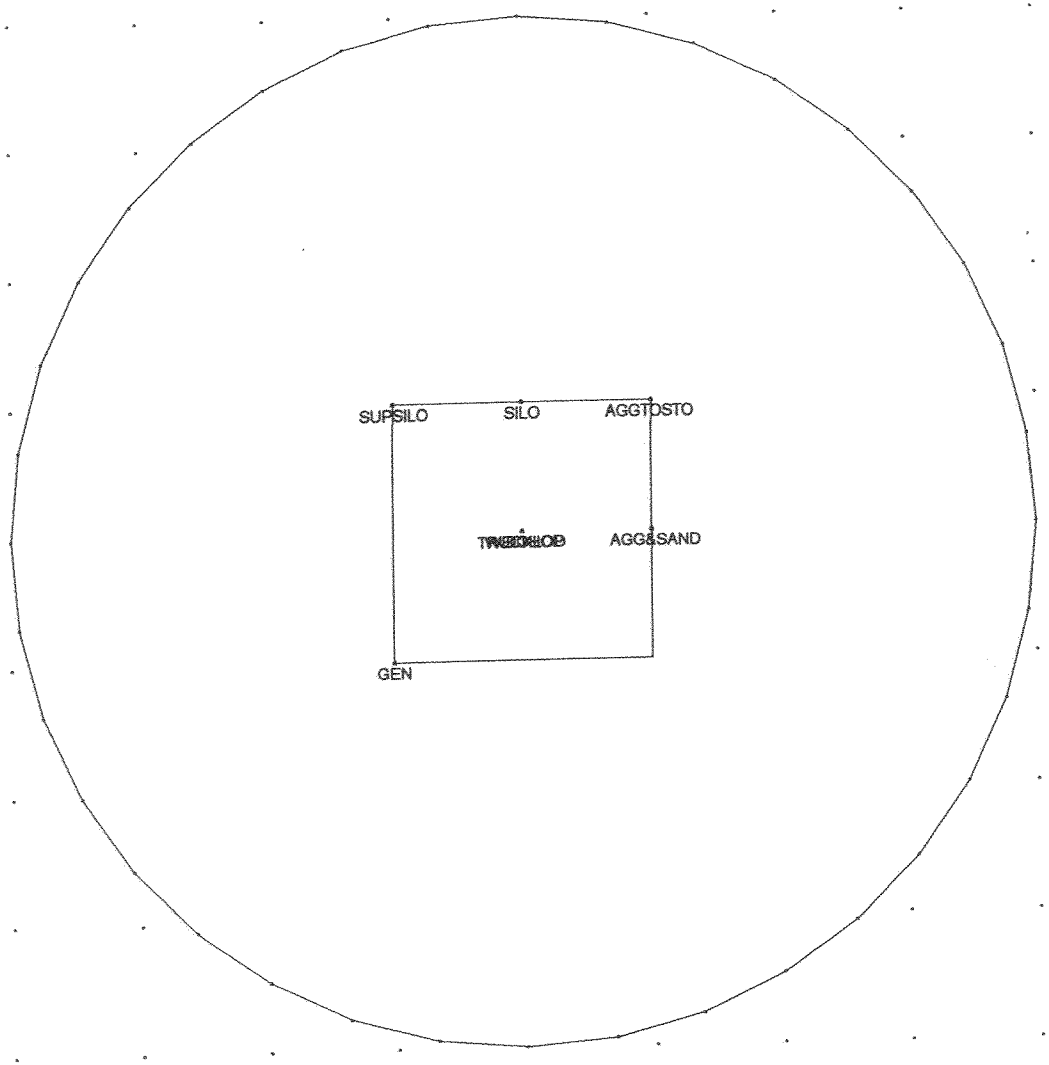
Designated Source: No

Potential to Emit: 0.90 tons per year

Pollutant which defines Potential to Emit: PM_{10} is highest emitting criteria pollutant.

Based on the total emissions for the facility, Interstate Concrete and Asphalt Corp.'s Dover Plant qualifies as a minor source of air pollutants and is therefore eligible for the Pre-Permit Construction Approval Application process.

6.0 SCALED PLOT PLAN



Concrete Batch Plant

F:\Projects\2007\ICA07002\Model\Dovermodel2.BST

Scale: 1" = 15.0 Meters